

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

IN RE:	
JAMES HENRY CALL TERRIE MACE CALL Debtors	Case No. 13-30686-KRH (Chapter 13)
CITIFINANCIAL, INC. D/B/A CITIFINANCIAL, INC. (WV) Movant v. JAMES HENRY CALL TERRIE MACE CALL and SUZANNE E. WADE, Trustee. Respondents	Ref. Dkt. #71

NOTICE OF DEFAULT

According to the records of CitiFinancial, Inc. D/B/A CitiFinancial, Inc. (WV) (“CitiFinancial”), the debtors, James Henry Call and Terrie Mace Call (“Debtors”) have failed to comply with the terms of the Consent Order Modifying Automatic Stay entered by this Court with regard to CitiFinancial’s Motion for Relief from the Automatic Stay (“Motion”):

1. That the Debtors are in default in making at least payment required under the Consent Order;
2. That the total amount due under the Consent Order is \$6,801.90, which includes five (5) regular monthly payments in the amount of \$1,350.38 each for the months of July, 2015

through November, 2015, plus \$50.00 in attorney's fees for the issuance of this Notice of Default.

3. That the Debtors send the full amount of the above missed payments to CitiFinancial Servicing LLC, PO Box 70918, Charlotte, NC 28272 within fourteen (14) days of the date on the Certificate of Service and make all other payments which may become due under the Consent Order during this period;

4. That the Debtors or Trustee must take one of the following actions within fourteen days after the date of the mailing of the notice of default:

- a. Cure the default;
- b. File an objection with the Court stating that no default exists; or
- c. File an objection with the Court stating any other reason why an Order granting relief from the automatic stay should not be entered;

5. That if the Debtors or Trustee do not take one of the actions set forth in paragraph 4, the Movant may file a certificate that it has complied with the terms of this Order and may submit together with the certificate a draft order terminating the automatic stay.

Respectfully submitted,

/s/ Kathryn Smits

Kathryn Smits, Bar #77337
ksmits@atlanticlawgrp.com
Hugh J. Green, Bar #86687
hgreen@atlanticlawgrp.com
Atlantic Law Group, LLC
P.O. Box 2548
Leesburg, Virginia 20177
(703) 777-7101

CERTIFICATION OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Notice of Default were mailed by first Class mail, postage-paid, or served electronically this 2 day of December, 2015 to the following parties:

James Henry Call
Terrie Mace Call
10803 Timber Run Road
Chesterfield, VA 23832
Debtors

Richard James Oulton, Esquire
America Law Group, Inc.
8501 Mayland Dr.
Suite 106
Henrico, VA 23294
Attorney for the Debtors

Suzanne E. Wade, Trustee
P.O. Box 1780
Richmond, VA 23218-1780

/s/ Kathryn Smits

Kathryn Smits, Esquire
Hugh J. Green, Esquire